



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Alec Poitevint, Treasurer
Republican National Committee - RNC
310 First Street, S.E.
Washington, DC 20003

NOV 1 2000

Identification Number: C00003418

Reference: June Monthly Report (5/01/00-5/31/00)

Dear Mr. Poitevint:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-In accordance with 11 CFR 104.8(e), a National Party Committee shall disclose in a memo Schedule A, information about each individual, committee, corporation, labor organization, or other entity that donates in excess of \$200 in a calendar year to the committee's non-federal account(s). Furthermore, in accordance with 11 CFR 104.9(c), a National Party Committee shall report in a memo Schedule B the full name and mailing address of each person to whom a disbursement in an aggregate amount or value in excess of \$200 within the calendar year is made from the committee's non-federal account(s), together with the date, amount and purpose of such disbursement.

Advisory Opinion 1992-33 discloses alternative methods for reporting the receipt of these contributions on the Committee's I Schedules. The full amount of the in-kind contributions received by the non-federal account should be disclosed on Schedule I with a supporting memo Schedule A that itemizes each contributor's identification. In addition, in order to reflect the fact that the reported in-kind donations have been expended in the same period as received by the committee, the total amount of the in-kind contributions should be entered on Line 5 of Schedule I as an other disbursement with a notation reference to the memo Schedule A filed for Line 1. Alternatively, the committee may include the total amount

of the in-kind contributions to the non-federal account on Line 1 and then make a cross reference to the entries on Schedule H4 to which the total amount relates. This reference should specify particular pages of the Schedule H4 where the in-kind donors are identified.

Please amend your reports to accurately disclose the non-federal in-kind contributions in accordance with one of the methods described above.

-The disclosure of some administrative expenses on Schedule H4 appear to be 100% non-federal activities. Please be advised that by definition, this activity does not qualify as a shared expense to be allocated between your federal and non-federal accounts. This activity should be itemized on a Schedule B for Line 21(b) of the Detailed Summary Page. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. Please amend your report to clarify this discrepancy.

-Please clarify all expenditures made for "Broadcast SVS" and "Ads" on Schedules H4 and B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E or F supporting Lines 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedules H4 of your report to clarify the following description(s): "consulting" and "consulting cost". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

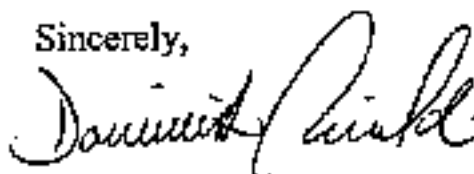
-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Transfers out to your non-federal account of excessive contributions should be properly disclosed on a separate Schedule B, supporting Line 22 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports

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Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dominick Ciaraldi".

Dominick Ciaraldi
Reports Analyst
Reports Analysis Division

